



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

April 18, 2019

Mr. Ken Taylor
Director
Division of Site Assessment, Remediation & Revitalization
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

**Subject: Request for Identification of State ARARs
Galey and Lord Site
Society Hill, Darlington County, SC
EPA ID: SCD058189622**

Dear Mr. Taylor:

As the State of South Carolina is aware, the Superfund Removal Program of the United States Environmental Protection Agency (EPA) is considering a Removal Action at the Galey and Lord Site (the Site) located in Society Hill, Darlington County, SC. To perform this action, the EPA will attempt to comply, to the extent practicable, with all Applicable or Relevant and Appropriate Requirements (ARARs) of State environmental and facility siting laws. This letter is a request that the State notifies the EPA On-Scene Coordinator (OSC) of any State statutes or regulations which the State believes are potential ARARs to the removal site. This letter also contains information on Site conditions and proposed actions to assist you in identifying ARARs.

The types of ARARs that will be considered in this removal action fall into the following three categories: chemical, location and action-specific requirements. Chemical-specific requirements are health, technology or risk-based numeric values that establish the acceptable amount or concentration of a chemical that may be found in, or discharged to, the ambient environment. Location-specific requirements are restrictions placed on the concentration of a hazardous substance or the conduct of activities solely because they occur in special locations. For example, the requirement that hazardous waste storage facilities located within a 100-year flood plain must be designed, constructed, operated and maintained to avoid washout is considered a location-specific requirement. Action-specific requirements are technology- or activity-based requirements or limitations on actions taken with respect to hazardous waste.

The Site is a former textile dye and finishing facility located on approximately 275 acres at 670 North Main Street, Society Hill, Darlington County, South Carolina. According to information provided by the South Carolina Department of Health and Environmental Control (DHEC), the property was originally developed in 1965 by Klopman Mills, a division of Burlington Industries. Burlington sold the facility to Galey & Lord Inc. in 1987. Galey & Lord Inc. was sold to a holdings company, Patriarch Partners, LLC, in 2004; thereafter ownership of the facility was transferred back to Galey & Lord, LLC. Operations at the Site ended in the summer of 2016. Galey and Lord, LLC is a defunct corporation. The Site consists



of two buildings (Plant I and Plant II), a boiler house, two coal storage areas, a coal runoff pond, a water treatment plant, a wastewater treatment plant, and several chemical and oil storage areas.

The boiler house was originally constructed to burn coal and included a coal yard but was later converted for gas combustion and the coal yards were abandoned. Evidence of coal is still present in two coal piles at the Site.

The wastewater treatment plant (WWTP) includes a 20 million-gallon (MG) lagoon, three equalization tanks (2 MG each), three aeration tanks (2.56 MG each), a 17,200-gal flash mix tank, a 107,700-gal flocculation tank, two 850,000-gal clarifiers, a 0.2-acre digester, and a 3.1-acre sludge storage pond. All water tanks, treatment vessels, and impoundments remain full or nearly full to capacity. An 8.8-acre former aeration pond at the Site has been filled in and standing water in the pond has been reduced by more than 50% of the original area. The wastewater treatment system was shut down but has not been remediated or maintained, following closure of the facility.

Historic contamination at the Site identified by DHEC includes: a chromic acid pit; two small landfills; and groundwater contamination. A pump and treat system that had been installed to address groundwater contamination ceased operating when the facility closed in 2016. DHEC visited the Site in October 2016 to conduct a Phase I Environmental Site Assessment and observed several tanks, drums and totes which were full or partially full at the Site.

DHEC again visited the Site in 2017 and observed active scrapping and demolition activities at the Site. DHEC also documented that the tanks, drums and totes had not been fully addressed. Based on the presence of these containers and hazardous materials, DHEC referred the Site to the Superfund program to conduct a Removal Site Evaluation (RSE) to determine if a removal action is appropriate. On February 22, 2018, the EPA's Emergency Response, Removal and Prevention Branch (ERRPB) conducted a RSE in accordance to Title 40 of the Code of Federal Regulations (CFR) Section 300.410. The OSC determined that the Site conditions meet the criteria for a removal action under Section 300.415 (b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan.

The EPA anticipates this removal action to be fund-lead due to lack of participation from the Potentially Responsible Parties (PRP). The EPA's proposed actions may include the following:

- Provide for access to the Site, and control access to the Site during removal activities;
- Conduct all work following an EPA-approved work plan detailing scope and schedule for activities;
- Arrange for off-site transportation and disposal/treatment of hazardous waste according to applicable regulations;
- Treatment of wastewater and caustics and discharge of the treated material into Grand Pee Dee River;
- Conduct all work pursuant to an EPA-approved Health and Safety Plan;
- Collect samples following an EPA-approved Quality Assurance Plan for laboratory analysis as necessary;
- Transport and dispose of any hazardous wastes as defined by CERCLA or exceeding site-specific cleanup goals, generated as a result of the removal actions, at an EPA-approved facility;
- Develop plans required to perform the removal activities as provided in the AOC.

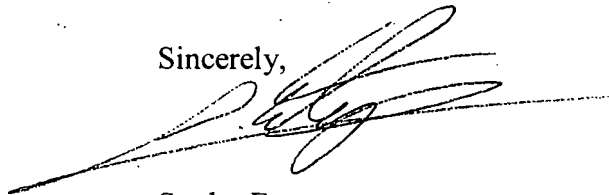
In order to adequately consider and comply with any ARARs specified by the State of South Carolina, the EPA would appreciate a timely response (within 14 business days if possible) to this request so that the requirements are considered for the removal action. Exact references or citations to the statutes or

regulations, or copies of pertinent provisions of State requirements, will greatly facilitate our ability to evaluate these requirements as ARARs for the Site.

The EPA will examine these requirements and determine whether they are applicable or relevant and appropriate to the Site. Pursuant to 40 CFR 300.415(j), removal actions shall, to the extent practicable considering the exigencies of the situation, attain ARARs under federal environmental or state environmental or facility siting laws. It is important to clarify, however, that some requirements identified by the State may be determined not to be ARARs, may be determined to be impracticable to meet or may qualify for a waiver. Please call me at (404) 290-5072, if you need additional information on the Site for the purpose of completing the ARARs review.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Serdar Ertep', with a long horizontal line extending to the left.

Serdar Ertep
Federal On-Scene Coordinator
Emergency Response, Removal & Prevention Branch
Ertep.serdar@epa.gov

cc: James W. Webster, Ph.D., Chief, ERRPB
Jim McGuire, Chief, Removal and Oil Programs Section
Matt Taylor, Chief, Removal Operations Section
Site File